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Attorneys for: Defendant Douglas Gene Halderman

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOUGLAS GENE HALDERMAN,

Defendant.

Case No. 1:21CR00242 ADA BAM

**STIPULATION TO REMOVE
PRETRIAL SUPERVISION
CONDITION OF DEFENDANT'S
RELEASE ON AN UNSECURED
BOND; DECLARATION OF
PETER M. JONES IN SUPPORT
OF STIPULATION;
ORDER THEREON**

Defendant, DOUGLAS GENE HALDERMAN, by and through counsel, Peter M. Jones, and Plaintiff, United States of America, by and through counsel, Antonio Pataca, hereby stipulates as follows:

That the condition of pretrial release supervision by Pretrial Services be removed as a condition of his release on a \$50,000 unsecured bond, and that all other terms and conditions not in conflict with this order shall remain in full force and effect

DECLARATION OF PETER M. JONES

1. I am an attorney duly licensed to practice in the State of California. I am counsel of record for Defendant, Douglas Gene Halderman, in the above-captioned action. Except as to matters based on information and belief, I have personal knowledge of the matters set forth in this declaration. Regarding matters stated on information and belief, I believe them

to be true. If called upon as a witness to testify about the content of this Declaration, I could and would competently do so.

2. One of the conditions of Defendant's release on an unsecured \$50,000 bond, was that he would be under the supervision of Pretrial Services. Supervisory Pretrial Services Officer Brian Bedrosian notified me that he is recommending that the pretrial supervision conditions (conditions A-H and J) of Mr. Halderman's release be vacated, and that all other conditions previously imposed and not in conflict with this order shall remain the same. The reason for this request is Mr. Halderman's debilitating health condition has required ongoing medical intervention in hospitals in both Fresno and San Francisco.

3. The four Standard Conditions continue to remain in effect: (1) The defendant must not violate federal, state or local law while on release; (2) The defendant must cooperate in the collection of a DNA sample if it is authorized by 42: 14135a; (3) The defendant must advise the court in writing before making any change of residence or telephone number; (4) The defendant must appear in court as required and, if convicted, must surrender as directed to serve a sentence that the court may impose. Condition “I” remains in effect, as well, in that defendant’s passport will remain surrendered and he must not apply for or obtain a passport or any other travel documents during the pendency of this case.

4. I have spoken with AUSA, Antonio Pataca, and that he agrees to stipulate to this change of conditions of the Defendant's pretrial release, as recommended by Officer Bedrosian.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this Declaration was executed on March 6, 2023 at Fresno California.

/s/ *Peter M. Jones*

1 DATED: MARCH 6, 2023.

RESPECTFULLY SUBMITTED,

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3 BY: /s/ PETER M. JONES
PETER M. JONES, COUNSEL FOR
DOUGLAS GENE HALDERMAN

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5 DATED: MARCH 8, 2023

PHILLIP A. TALBERT, U.S. ATTORNEY

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7 By: /s/ ANTONIO PATAKA
8 ANTONIO PATAKA,
9 ASSISTANT U.S. ATTORNEY

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11 **ORDER**

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13 Having reviewed the above Stipulation and Good Cause Appearing, it is hereby
14 ordered that the condition of “pretrial release supervision” as set forth in conditions A-H and J,
15 be vacated from the Defendant’s release on a \$50,000 unsecured bond. All other standard and
16 specific conditions of release not in conflict with this order shall remain in full force and effect.

17 IT IS SO ORDERED.

18 Dated: **March 8, 2023**

19 /s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE